

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN KARARO, et al. individually, and on)	
behalf of all other Illinois citizens similarly)	
situated,)	
Plaintiffs,)	Case No. 23-cv-02187
v.)	
)	District Judge Jorge L. Alonso
OLD DOMINION FREIGHT LINE INC.,)	
)	Magistrate Judge Heather K. McShain
Defendant.)	

**JOINT MOTION TO (A) STAY FACT DISCOVERY WHILE THE PARTIES
CONTINUE SETTLEMENT DISCUSSIONS AND (B) MODIFY THE BRIEFING
SCHEDULE RELATED TO PLAINTIFFS' MOTION FOR SANCTIONS (Dkt. 216)**

NOW COME Plaintiffs John Kararo, Sean Walker, Ian Travis, Melvyn L. Caison Jr., Gabriel Castellano, and Diego Delgado ("Plaintiffs") and Defendant Old Dominion Freight Line, Inc. ("Defendant"), by their undersigned counsel, and jointly move to (A) stay discovery while the parties continue settlement discussions and (B) modify the briefing schedule related to Plaintiff's Motion For Sanctions (Dkt. 216):

1. As described in the parties' last Joint Status Report (Dkt. 233), the parties have made substantial progress toward a potential class-wide settlement. Since the parties last reported their progress to the Court, an additional round of proposals has been exchanged by each side. To facilitate these discussions, the parties previously agreed to a "pause" in discovery, and jointly requested an extension of the fact discovery deadline and the briefing schedule previously set on Plaintiffs' Motion for Sanctions.

2. On October 2, 2024, the Court granted the parties' requested extension of the fact discovery deadline through December 13, 2024 and extended the parties' briefing deadlines on Plaintiffs' Motion for Sanctions. (Dkt. 229.)

3. On October 24, 2024, the Court granted Defendant's Motion for Extension of Deadline to Respond to Plaintiffs' Motion for Sanctions, extending Defendant's deadline to file a Response to Plaintiffs' Motion to November 13, 2024, and Plaintiffs' deadline to file a Reply, if any, to November 27, 2024. (Dkt. 231.)

4. On November 1, 2024, the parties jointly reported substantial progress in their settlement discussions, including the exchange of multiple counterdemands and counteroffers. (Dkt. 233.) The parties further reported that they were discussing whether to jointly request a stay of discovery, and the terms of such a stay, and would promptly notify the Court of same. (*Id.*)

5. On November 5, 2024, the Court stated that it would entertain a joint motion to stay discovery at any time and ordered the parties to file a further joint status report on December 2, 2024, updating the Court on the progress of settlement discussions. (Dkt. 234.)

6. To conserve the resources of the parties and the Court, the parties now jointly request that the Court enter a stay of discovery in this matter.

7. And by agreement, the parties propose to modify the briefing schedule set on Plaintiffs' Motion for Sanctions as follows: Defendant's response due December 11, 2024, and Plaintiffs' reply due by December 30, 2024.

WHEREFORE, for the reasons set forth above, the parties respectfully request that the Court grant this Motion and enter an Order: (a) staying fact discovery; and (b) extending Defendant's deadline to respond to Plaintiffs' Motion for Sanctions to December 11, 2024, with Plaintiffs' reply due by December 30, 2024.

Dated: November 12, 2024

Counsel for Plaintiffs

By: /s/ James C. Vlahakis

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Respectfully submitted,

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By: /s/ Jody Kahn Mason

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CERTIFICATE OF SERVICE

I, Jody Kahn Mason, an attorney, certify that on this 12th day of November, 2024, I caused a true and correct copy of the foregoing ***Joint Motion to (A) Stay Fact Discovery While the Parties Continue Settlement Discussions and (B) Modify the Briefing Schedule Related to Plaintiffs' Motion for Sanctions (Dkt. 216)*** to be filed with the Clerk of the Court using the Electronic Filing System, which will send notification of such filing to all counsel of record.

/s/ Jody Kahn Mason